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*Attorneys for Defendant Sweet Home Belmont,*  
7 *LLC*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 VALERIE SOTO, an individual,

12 Plaintiff,

13 vs.

14 INFINITY HOSPICE CARE, LLC, an Arizona  
limited liability company; NEVADA  
15 HOSPICE AND PALLIATIVE CARE, INC., a  
Nevada corporation; INFINITY HOSPICE  
16 CARE OF LAS VEGAS, LLC, a Nevada  
limited liability company; INFINITY  
17 HOSPICE CARE OF RENO, LLC, a Nevada  
limited liability company; SWEET HOME  
18 BELMONT, LLC, a Nevada limited liability  
company; DOES I-X; ROE CORPORATIONS  
19 AND/OR ENTITIES I-X,

20 Defendants.  
21

Case No. 2:22-cv-00632-BNW

**[PROPOSED] STIPULATION AND  
ORDER TO STAY DISCOVERY**

22 Plaintiff, VALERIE SOTO (“Plaintiff”), and Defendants, INFINITY HOSPICE CARE,  
23 LLC; NEVADA HOSPICE AND PALLIATIVE CARE, INC.; INFINITY HOSPICE CARE OF  
24 LAS VEGAS, LLC; INFINITY HOSPICE CARE OF RENO, LLC; and SWEET HOME  
25 BELMONT, LLC (“Defendants”), by and through their counsel of record, for good cause shown,  
26 pursuant to Federal Rule of Civil Procedure (FRCP) LR IA 6-1 and LR 26-3, that parties timely  
27 submit this [First] Proposed Stipulation and Order to stay all discovery deadlines set forth in this  
28

Court's Scheduling Order dated August 22, 2022 (ECF No. 23) ("Scheduling Order"),<sup>1</sup> pending the Court's determination on Defendants motions and respectfully request that the Court approve this Stipulation and Order to Stay Discovery and request a Status Check in March 2023, which is after the current discovery deadline of February 20, 2023, as set forth in the Scheduling Order as follows:

A. Discovery Completed

- 1) On September 1, 2022, Plaintiff served her Initial List of Witnesses and Production of Documents Pursuant to FRCP 26(a)(1) to Defendants Infinity Hospice Care, LLC; Infinity Hospice Care of Las Vegas, LLC; Infinity Hospice Care of Reno, LLC; Nevada Hospice and Palliative Care, Inc., and Defendant Sweet Home Belmont, LLC.
- 2) On September 01, 2022, Infinity Defendants served their Initial Rule 26(a)(1) Disclosure.
- 3) On October 17, 2022, Plaintiff served Plaintiff's First Set of Interrogatories to Defendant Infinity Hospice Care, LLC (IHC), Plaintiff's First Set of Interrogatories to Infinity Hospices Care of Las Vegas, (IHC-LV); Plaintiff's Interrogatories to Infinity Hospice Care of Reno, LLC (IHCR); Plaintiff's First Set of Interrogatories to Nevada Hospice and Palliative Care, Inc.; Plaintiff's First Set of Request for Production of Documents to Defendant Infinity Hospice Care of Las Vegas, LLC (IHC-LV); Plaintiff's First Set of Request for Production of Documents to Infinity Hospice Care of Reno, LLC (ICHR); Plaintiff's First Set of Request for Production of Documents to Nevada Hospice & Palliative Care, Inc.; Plaintiff's First Set of Request for Production of Documents to Sweet Home Belmont, LLC;
- 4) On November 16, 2022, Infinity Defendants (ICH, ICH-LV, ICH-R, Nevada Hospice & Palliative Care, Inc) served responses to each of Plaintiff's written discovery requests.
- 5) This Stipulation is made in good faith and serves the interests of efficiency and economy

<sup>1</sup> Because this Stipulation & Order requests a Status Check in March 2023 which is after the expiration of the current discovery cut-off of February 20, 2023, as set forth in this Court's Scheduling Order, (ECF No. 23) and will thus operate to extend current discovery deadlines set forth in the current Order, the parties submit Stipulation and Order this in compliance with LR 26-3.

by a stay of current discovery deadlines pending the outcome of Defendants' motions to dismiss. For these reasons, the parties agree to stay and thereafter establish new discovery deadlines, upon the Court's determination of Defendants' pending motions to dismiss;

B. Discovery yet to be completed.

Other than the discovery set forth above, all other discovery remains to be completed in this case.

5) The discovery deadline of February 20, 2023 and all other discovery deadlines set forth in ¶IV of the Scheduling Order shall be stayed pending ruling on the Defendants' motions to dismiss, subject to the potential lifting of the stay upon terms and conditions set forth herein and that the parties and the Court deem just; and,

6) Proposed Schedule The parties request the Court to set a status check sometime in March 2023, which is after the current discovery deadline in the Court's August 22, 2022, Order (ECF No. 22), to discuss amended discovery scheduling and, if necessary, the pendency of Defendants' motions to dismiss.

Respectfully Submitted:

DATED this 12<sup>th</sup> day of December, 2022.

DATED this 12<sup>th</sup> day of December, 2022.

PAUL PADDA LAW, PLLC

ALVERSON, TAYLOR & SANDERS

/s/ Paul S. Padda  
PAUL S. PADDA, ESQ.  
Nevada Bar No. 10417  
4560 S. Decatur Blvd., Suite 300  
Las Vegas, NV 89103  
*Attorneys for Plaintiff*

/s/ Yuliya Brady  
KURT R. BONDS, ESQ.  
Nevada Bar No. 6228  
ADAM KNECHT, ESQ.  
Nevada Bar No. 13166  
YULIYA BRADY, ESQ.  
Nevada Bar No. 14699  
6605 Grand Montecito Parkway  
Suite 200  
Las Vegas, NV 89149  
*Attorneys for Defendants Infinity Hospice  
Care, LLC; Nevada Hospice and Palliative  
Care, Inc., Infinity Hospice Care of Las Vegas,  
LLC, and Infinity Hospice Care of Reno, LLC*

1 Dated this 12<sup>th</sup> day of December, 2022.

2 LEWIS BRISBOIS BISGAARD  
3 & SMITH LLP

4 /s/ Melanie L. Thomas

5 S. BRENT VOGEL, ESQ.

Nevada Bar No. 6858

6 MELANIE L. THOMAS, ESQ.

Nevada Bar No. 12576

7 *Attorneys for Defendant Sweet Home*  
8 *Belmont, LLC*

9  
10  
11  
12  
13  
14  
15 **ORDER**

16 IT IS ORDERED that ECF No. 33 is GRANTED in part and DENIED in part. IT IS GRANTED to the  
17 extent that all discovery deadlines will be stayed pending the Court's ruling on Defendants'  
18 motions to dismiss.

19 IT IS FURTHER ORDERED that the parties shall submit a new proposed Discovery Plan and  
20 Scheduling Order ("DPSO") within 14 days after the Court's ruling on the pending motions to  
21 dismiss. If the parties seek a status conference after the Court's ruling on the motions to dismiss  
22 and their submission of a new DPSO, they may seek it when they submit their DPSO.

23 **IT IS SO ORDERED**

24 **DATED:** 6:30 pm, December 13, 2022

25 

26 **BRENDA WEKSLER**  
27 **UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I certify that that on 12<sup>th</sup> day of December, 2022, I electronically filed the foregoing **[PROPOSED] STIPULATION AND ORDER TO STAY DISCOVERY** via this court's electronic filing system. Parties who are registered with this court's electronic filing system will be served electronically.

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Attorney for Plaintiff

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MADELINE L. DICICCO, ESQ.  
Nevada Bar No. 5934  
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6605 Grand Montecito Parkway  
Suite 200  
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(702) 384-7000  
Attorneys for Defendants Infinity Hospice Care, LLC;  
Nevada Hospice and Palliative Care, Inc.,  
Infinity Hospice Care of Las Vegas, LLC, and  
Infinity Hospice Care of Reno, LLC

By /s/ Heidi Brown  
An Employee of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

**From:** [Lani Esteban-Trinidad](#)  
**To:** [Yuliya Brady](#); [Thomas, Melanie](#)  
**Cc:** [Paul Padda](#); [JJ Kashnow](#); [Adam Knecht](#); [Vogel, Brent](#); [Kim-Mistrille, Gaylene](#); [Galvez, Catherine](#); [Brown, Heidi](#)  
**Subject:** [EXT] RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW  
**Date:** Monday, December 12, 2022 11:55:34 AM  
**Attachments:** [image003.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

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Paul approved and you can affix his e-signature.

*Lani Esteban, J.D., Paralegal*

[lanip@paulpaddalaw.com](mailto:lanip@paulpaddalaw.com)

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---

**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>  
**Sent:** Monday, December 12, 2022 10:14 AM  
**To:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>  
**Cc:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>  
**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Hi,

I have attached the final version where I removed the paragraph about Belmont's responses not being received by Plaintiff. Everything else is the same. Melanie, you can use my e-signature.

Yulia

**Yuliya Brady, Esq.** |  
Alverson Taylor & Sanders  
702.384.7000 | [alversontaylor.com](http://alversontaylor.com)

---

**From:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>  
**Sent:** Thursday, December 08, 2022 9:35 AM  
**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>  
**Cc:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi

<[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Paul did receive Sweet Home's responses by mail, we can remove the paragraph.

*Lani Esteban, J.D., Paralegal*

[lanip@paulpaddalaw.com](mailto:lanip@paulpaddalaw.com)

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---

**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Wednesday, December 7, 2022 3:35 PM

**To:** 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Are we waiting for Paul's signature?

**Yuliya Brady, Esq.** |

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702.384.7000 | [alversontaylor.com](http://alversontaylor.com)

---

**From:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Sent:** Wednesday, December 07, 2022 3:29 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Cc:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

What do you mean? My understanding is that we are waiting on Paul? We resent the responses to written discovery previously served on Paul, to Lani. That's all I know.



**Melanie L. Thomas**

**Partner**

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**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Wednesday, December 7, 2022 9:21 AM

**To:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** [EXT] FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Good morning Melanie,

Where are we on this?

**Yuliya Brady, Esq.** |  
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---

**From:** Yuliya Brady

**Sent:** Tuesday, December 06, 2022 9:00 AM

**To:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Hi,

I added the paragraph that Plaintiff mentioned as number 5. You can use my e-signature.

**Yuliya Brady, Esq.** |  
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---

**From:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>

**Sent:** Monday, December 05, 2022 6:47 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

These were not received by Plaintiff. The certificate of service states only that these were electronically served, but there is no electronic service of this in federal CM/ECF.

Plaintiff agrees to the draft that states Plaintiff did not receive Sweet Home's responses and will sign a draft that retains the paragraph in Plaintiff's initial edits/revisions.



*Lani Esteban, J.D., Paralegal*

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---

**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Monday, December 5, 2022 2:20 PM

**To:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Here you go.

**Yuliya Brady, Esq.** |

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---

**From:** Kurt Bonds <[KBonds@AlversonTaylor.com](mailto:KBonds@AlversonTaylor.com)>

**Sent:** Wednesday, November 16, 2022 6:02 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>

**Subject:** FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

## Kurt Bonds, Esq.



Alverson Taylor  
& Sanders  
Nevada's Law Firm

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**From:** Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>

**Sent:** Wednesday, November 16, 2022 4:57 PM

**To:** [psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com); Kurt Bonds <[KBonds@AlversonTaylor.com](mailto:KBonds@AlversonTaylor.com)>; ATMS Copy Room Efile <[efiling@AlversonTaylor.com](mailto:efiling@AlversonTaylor.com)>

**Cc:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Attached: Defendant Sweet Home Belmont's Response to Plaintiff Soto's First Set of Requests For Production of Documents

**Gaylene Kim-Mistrille**  
**Legal Secretary to**  
**S. Brent Vogel**  
**Ethan Featherstone**  
**Melanie L. Thomas**

[gaylene.kim-mistrille@lewisbrisbois.com](mailto:gaylene.kim-mistrille@lewisbrisbois.com)

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**From:** [Yuliya Brady](#)  
**To:** "Lani Esteban-Trinidad"; Thomas, Melanie  
**Cc:** Paul Padda; JJ Kashnow; Adam Knecht; Vogel, Brent; Kim-Mistrille, Gaylene; Galvez, Catherine; Brown, Heidi  
**Subject:** [EXT] RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW  
**Date:** Monday, December 12, 2022 10:15:25 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image004.png](#)  
[image005.png](#)  
[Plaintiffs rev. SO to stay discovery 12-7-22 12-12-22.docx](#)

---



Hi,

I have attached the final version where I removed the paragraph about Belmont's responses not being received by Plaintiff. Everything else is the same. Melanie, you can use my e-signature.

Yulia

**Yuliya Brady, Esq.** |

Alverson Taylor & Sanders

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---

**From:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>

**Sent:** Thursday, December 08, 2022 9:35 AM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Paul did receive Sweet Home's responses by mail, we can remove the paragraph.

*Lani Esteban, J.D., Paralegal*

[lani@paulpaddalaw.com](mailto:lani@paulpaddalaw.com)

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4560 South Decatur Blvd, Unit 30370

Las Vegas, Nevada 89103

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---

**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Wednesday, December 7, 2022 3:35 PM

**To:** 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Are we waiting for Paul's signature?

**Yuliya Brady, Esq.** |

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---

**From:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Sent:** Wednesday, December 07, 2022 3:29 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Cc:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

What do you mean? My understanding is that we are waiting on Paul? We resent the responses to written discovery previously served on Paul, to Lani. That's all I know.



**Melanie L. Thomas**

**Partner**

[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)

**T: 702.693.1718 F: 702.366.9563**

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**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Wednesday, December 7, 2022 9:21 AM

**To:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; Galvez, Catherine <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** [EXT] FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Good morning Melanie,

Where are we on this?

**Yuliya Brady, Esq.** |

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---

**From:** Yuliya Brady

**Sent:** Tuesday, December 06, 2022 9:00 AM

**To:** 'Lani Esteban-Trinidad' <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Hi,

I added the paragraph that Plaintiff mentioned as number 5. You can use my e-signature.

**Yuliya Brady, Esq.** |

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---

**From:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>

**Sent:** Monday, December 05, 2022 6:47 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** RE: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

These were not received by Plaintiff. The certificate of service states only that these were electronically served, but there

is no electronic service of this in federal CM/ECF.

Plaintiff agrees to the draft that states Plaintiff did not receive Sweet Home's responses and will sign a draft that retains the paragraph in Plaintiff's initial edits/revisions.

Lani Esteban, J.D., Paralegal

[lanip@paulpaddalaw.com](mailto:lanip@paulpaddalaw.com)

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**From:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>

**Sent:** Monday, December 5, 2022 2:20 PM

**To:** Lani Esteban-Trinidad <[Lani@paulpaddalaw.com](mailto:Lani@paulpaddalaw.com)>; Paul Padda <[psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)>

**Cc:** JJ Kashnow <[JKashnow@AlversonTaylor.com](mailto:JKashnow@AlversonTaylor.com)>; 'Vogel, Brent' <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; 'Thomas, Melanie' <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>; 'Galvez, Catherine' <[Catherine.Galvez@lewisbrisbois.com](mailto:Catherine.Galvez@lewisbrisbois.com)>; 'Kim-Mistrille, Gaylene' <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>; 'Brown, Heidi' <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Here you go.

**Yuliya Brady, Esq.**

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---

**From:** Kurt Bonds <[KBonds@AlversonTaylor.com](mailto:KBonds@AlversonTaylor.com)>

**Sent:** Wednesday, November 16, 2022 6:02 PM

**To:** Yuliya Brady <[YDavidzenka@AlversonTaylor.com](mailto:YDavidzenka@AlversonTaylor.com)>; Adam Knecht <[AKnecht@AlversonTaylor.com](mailto:AKnecht@AlversonTaylor.com)>

**Subject:** FW: Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

**Kurt Bonds, Esq.**



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---

**From:** Kim-Mistrille, Gaylene <[Gaylene.Kim-Mistrille@lewisbrisbois.com](mailto:Gaylene.Kim-Mistrille@lewisbrisbois.com)>

**Sent:** Wednesday, November 16, 2022 4:57 PM

**To:** [psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com); Kurt Bonds <[KBonds@AlversonTaylor.com](mailto:KBonds@AlversonTaylor.com)>; ATMS Copy Room Efile <[efiling@AlversonTaylor.com](mailto:efiling@AlversonTaylor.com)>

**Cc:** Thomas, Melanie <[Melanie.Thomas@lewisbrisbois.com](mailto:Melanie.Thomas@lewisbrisbois.com)>; Vogel, Brent <[Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)>; Brown, Heidi <[Heidi.Brown@lewisbrisbois.com](mailto:Heidi.Brown@lewisbrisbois.com)>

**Subject:** Valerie Soto v. Infinity Hospice Care, et al. - Case No. 2:22-cv-00632-BNW

Attached: Defendant Sweet Home Belmont's Response to Plaintiff Soto's First Set of Requests For Production of Documents

**Gaylene Kim-Mistrille**

**Legal Secretary to**

**S. Brent Vogel**

**Ethan Featherstone**

**Melanie L. Thomas**

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